



Brian D. McGrath
(212) 895-4222
BMcGrath@crowell.com

December 10, 2021

BY ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: Kim Mortimer v. NYC ACS Caseworker Beverly Wilson, 15-cv-7186 (KPF), Request for
Leave to File Document Under Seal

Dear Judge Failla:

Pursuant to Your Honor's Individual Rules of Practice in Civil Cases, Plaintiff Ms. Mortimer respectfully requests leave to file a Stipulation and Order of Settlement and Dismissal ("Stipulation") under seal. The Stipulation contains sensitive and personal information that Plaintiff wishes to keep under seal.

While there is a presumption in favor of public access to judicial documents, *see, e.g., Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006), this redaction will not impair the public's ability to access or understand the terms of the Stipulation. Granting leave to file the Stipulation under seal will preserve Plaintiff's ability to keep important personal information private.

Pursuant to Your Honor's Individual Rules of Practice in Civil Cases, we attach hereto a copy of the Stipulation with the proposed redactions and a copy of the unredacted Stipulation with the proposed redactions highlighted.

Plaintiff appreciates the Court's efforts in this matter and remain available to discuss at the Court's convenience.

The Honorable Katherine Polk Failla
December 10, 2021
Page 2

Respectfully submitted,

/s/ Brian McGrath

Brian D. McGrath
Anne Li
Crowell & Moring LLP
590 Madison Avenue, 20th Floor
New York, NY 10022

Karla Arias
Crowell & Moring LLP
1001 Pennsylvania Ave, N.W.
Washington, DC 20004

NYACTIVE-21424725.1

Application GRANTED. The unredacted version of the Stipulation and Order of Settlement and Dismissal may be filed under seal, viewable only to the parties and the Court. (Dkt. #321-2, 322).

The Clerk of Court is directed to terminate the pending motion at docket entry 321.

Date: December 10, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE